

REMARKS/ARGUMENTS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow. Claims 1-4, 6-13, 15-18, 20-28, 30, 31, 35, and 39-42 have been canceled, and Claims 43-78 have been newly added. Applicant respectfully submits that no new matter has been added to the application. Claims 5, 14, 19, 29, 32-34, and 36-38 were canceled in previous amendments. After amending the claims as set forth above, Claims 43-78 are now pending in this application.

I. Claims 1-4, 6, 7, 10-13, 15-18, 20-22, 25-28, 30, 31, 35, and 39-42

In section 2 of the Office Action, Claims 1-4, 6, 7, 10-13, 15-18, 20-22, 25-28, 30, 31, 35, and 39-42 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,430,183 to Satran et al. (*Satran*) in view of U.S. Patent No. 6,175,875 to Stapleton et al. (*Stapleton*), further in view of U.S. Patent No. 6,490,285 to Lee et al. (*Lee*), and further in view of U.S. Patent No. 6,505,247 to Steger et al. (*Steger*). Applicant respectfully submits that the rejection is moot in view of the claim amendments.

Newly added Claim 43 recites in part:

identifying one or more parameters associated with at least one of the receiver addresses;

filtering the multicast data packet based on the one or more parameters to generate a filtered data packet; and

(Emphasis added). Independent Claims 59, 67, and 73, although of different scope, recite similar elements.

On page 5 of the Office Action, the Examiner acknowledged that:

Satran, Stapleton, and Lee *fail to teach obtaining filtered multicast data packets individualized for the respective receivers* and transmitting, by the routing unit, the individualized filtered multicast data packets to the addresses of the respective receivers.

(Emphasis added). Although reworded, newly added Claim 43 similarly recites “filtering the multicast data packet based on the one or more parameters to generate a filtered data packet.” Applicant agrees that the combination of *Satran*, *Stapleton*, and *Lee* fails to teach such elements. However, the Examiner asserted that *Steger* discloses such elements at col. 8, lines 40-47. Applicant respectfully disagrees with the Examiner’s interpretation of *Steger*.

Steger is directed to “industrial automation software which provides a graphical interface to a process, such as either a human machine interface (HMI) or supervisory control and data acquisition (SCADA) capabilities.” (Col. 1, lines 14-17). At col. 8, lines 30-47, *Steger* discloses that:

In one embodiment, the *server process 210 determines if a plurality of clients 230 are interested in at least a subset of the same data elements*. If so, the *server process 210 operates to generate a multi-cast packet* which is a packet comprising data element values, preferably in a compressed format, which are desired by each of the plurality of clients. *Once this packet is completed*, i.e., when it has reached a certain size or when a certain timeout period has elapsed, *the server process 210 operates to multi-cast this packet to each of the plurality of clients 232* which are interested in this common data. A multi-cast packet is not required to be separately transmitted for each destination client 230. Rather, a multi-cast packet is transmitted only once, and routers operate to route the multi-cast packet to each of the plurality of destinations. This further reduces network traffic by reducing the amount of individual packets which would normally be required to be transmitted in a point-to-point single-cast system.

(Emphasis added).

Thus, *Steger* discloses that, if a plurality of clients are interested in the same data elements, a server generates a multi-cast packet and distributes the multi-cast packet to the plurality of clients. Applicant respectfully submits that simply generating and distributing a multi-cast packet is not the same as “filtering the multicast data packet based on the one or more parameters to generate a filtered data packet,” as claimed. *Steger* fails to teach, suggest, or describe such filtering of a received multicast data packet or generating of a filtered data packet.

For at least these reasons, Applicant respectfully submits that the combination of *Satran*, *Stapleton*, *Lee*, and *Steger* fails to teach, suggest, or describe each of the elements recited in independent Claims 43, 59, 67, and 73. For at least the same reasons, Applicant respectfully submits that the combination of *Satran*, *Stapleton*, *Lee*, and *Steger* fails to teach, suggest, or describe each of the elements recited in dependent Claims 44-58, 60-66, 68-72, and 74-78. Withdrawal of the rejection under 35 U.S.C. § 103(a) is respectfully requested.

II. Claims 8, 9, 23, and 24

In section 3 of the Office Action, Claims 8, 9, 23, and 24 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Satran* in view of *Stapleton*, further in view of *Lee*, further in view of *Steger*, and further in view of U.S. Patent No. 6,331,983 to *Haggerty* et al. (*Haggerty*). Applicant respectfully submits that the rejection is moot in view of the claim amendments.

As discussed above, Applicant respectfully submits that the combination of *Satran*, *Stapleton*, *Lee*, and *Steger* fails to teach, suggest, or describe at least “filtering the multicast data packet based on the one or more parameters to generate a filtered data packet,” as recited in Claim 43, and as similarly recited in Claims 59, 67, and 73. *Haggerty*, which is directed to “establishing connections in a switch-based communications network for multicast traffic” (abstract), also fails to teach, suggest, or describe such elements.

For at least these reasons, Applicant respectfully submits that the combination of *Satran*, *Stapleton*, *Lee*, *Steger*, and *Haggerty* fails to teach, suggest, or describe each of the elements recited in the independent claims. Withdrawal of the rejection under 35 U.S.C. § 103(a) is respectfully requested.

III. Conclusion

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by the credit card payment instructions in EFS-Web being incorrect or absent, resulting in a rejected or incorrect credit card transaction, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. § 1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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